

V
Internal Revenue Service
memorandum

CC:TL

Br4:JTChalhoub

date: **JAN 17 1986**

to: District Counsel, Houston CC:HOU:TL

from: Acting Director, Tax Litigation Division CC:TL

subject: [REDACTED]; Request For
Technical Advice - Interest Suspension - Rev. Rul. 56-501

This is in response to your September 27, 1985, request for technical advice in the above-cited case.


ISSUE

Does section 6601(c) operate to suspend interest on a deficiency when a taxpayer waives restrictions on assessment and collection in connection with a stipulated settlement in a Tax Court case. 6213.08-00; 6601.01-00.

CONCLUSION

Rev. Rul 56-501, 1956-2 C.B. 954, is correct and is not in conflict with § 301.6213-1(d) of the regulations. Accordingly, the interest suspension provisions of section 6601(c) apply to stipulated settlements in Tax Court cases. This conclusion is more fully explicated in the attached copy of an Office Memorandum from the Director, Interpretative Division.

MARLENE GROSS
Acting Director

By: 
HENRY G. SALAMY
Chief, Branch No. 4
Tax Litigation Division

Attachment:
Copy of Office Memorandum

08012